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April 23, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of March 31, 2021, ECF No. 6698, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's order of November 24, 2020, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On March 29, 2021, counsel for the Muslim World League, the International Islamic Relief Organization, and witness Abdullah Al Turki indicated that their clients will not seek any sealing or redaction in connection with the set of filings leading up to the January 22, 2019 orders. Counsel for the King Fahad Mosque and witnesses Khalil Al Khalil and Osman Kaldirim have recently indicated that their clients are continuing to review the filings to determine whether they will propose any redactions.

On April 21, 2021, counsel for Saudi Arabia circulated to the parties a set of proposed redactions for the sealed filings leading up to the Court's January 7, April 27, and May 7, 2020 orders. On April 22, 2021, counsel for Dallah Avco indicated that they had reviewed Saudi Arabia's circulation and that their client would not propose any redactions for those filings.

Earlier today, Plaintiffs circulated to the parties a set of proposed redactions for the sealed filings leading up to the Court's January 7, April 27, May 7, May 27, August 11, August 27, and October 2, 2020 orders.

The FBI has made substantial progress reviewing the parties' proposed redactions to the sealed filings leading up to the Court's November 25, 2019 and January 3, 2020 orders, and

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expects to complete that review and propose any additional redactions to those motion papers by May 14, 2021.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before May 24, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)